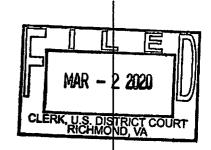
27

28



### IN THE UNITED STATES DISTRICT COURT

#### FOR THE EASTERN DISTRICT OF VIRGINIA

### RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Case No.: 3:17-cv-00601-MHL

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S MOTION TO APPEAR BY TELEPHONE

# DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S MOTION TO APPEAR BY TELEPHONE

Defendant Jason Goodman Pro Se respectfully submits this response in opposition to co-Defendant Negron's motion to appear by telephone. None of the reasons cited in the motion are unexpected circumstances that were unforeseen at the time of the scheduling and no reason is given as to why Negron has waited until now to bring these issues to the court's attention. It is important that co-Defendant Negron fulfill her obligation to appear in person, in court as agreed to and ordered.

DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S MOTION TO APPEAR BY TELEPHONE - 1

Co-Defendant Negron's motion to appear by telephone should be denied because Ms.

Negron has previously agreed to appear in person, in court as ordered. During the negotiation of the schedule of that agreed upon hearing, Ms. Negron's counsel made no mention of the circumstances described in the motion to appear by telephone. The motion cites the financial hardship of appearing but fails to address the legal fees associated with the motion and requested hearing.

Ms. Negron and her actions are cited throughout Plaintiff's amended complaint. Ms. Negron publicly broadcast at least two interviews with a client of counsel for Plaintiff Steven S. Biss just weeks after Biss emailed a phone number thought to be that of Negron to individuals who admit to being associates and even paid operatives of Biss and his wife Tanya Cornwell. These actions were the cause of the motion to disqualify Biss as counsel for Plaintiff. The motion to disqualify may have played a role in Judge Lauck's decision to cancel the trail date sua sponte and order this settlement hearing. It is important that the relevant parties be present at the settlement despite the personal and financial hardship an in-person appearance may cause.

Defendant Goodman opposes co-Defendant Negron's motion to appear by telephone for the reasons stated above. For these reasons in addition to any other reasons the court sees fit, co-Defendant Negron's motion should be denied.

Respectfully submitted February 26, 2020,

Jason Goodman, Defendant, Pro Se 252 7th Avenue Apt 6s New York, NY 10001

New York, NY 10001 (323) 744-7594

truth@crowdsourcethetruth.org

DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S MOTION TO APPEAR BY TELEPHONE - 2

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRIGINIA RICHMOND DIVISION

ROBERT DAVID STEELE, e	t al.,				
Plai	intiff(s),				
v.		Civil Action Number: 3:17-cv-00601-MH			
JASON GOODMAN, et al.,					
Def	fendant(s).				
LOC	AL RULE 83.1(M) CE	RTIFICATION			
I declare under penalty of perjur	y that:				
No attorney has prepared, or assisted in the preparation o		DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S MOTION TO APPEAR BY			
lason Goodman	_	TELEPHONE			
Signature of <i>Pro Se</i> Party  Executed on: _February 26, 2020					
	OR				
The following attorney(s) prepare	ed or assisted me in pronounce	otion of			
t he following attorney(s) prepare	cu or assisted me in prepara	(Title of Document)			
(Name of Attorney)	_				
(Address of Attorney)	_				
(Telephone Number of Attorney) Prepared, or assisted in the preparation	of, this document				
(Name of <i>Pro Se</i> Party (Print or Type)	_				
Signature of Pro Se Party	_				
Executed on:	_(Date)				

Circuit Co	ourt for <u>Eastern</u>				ase No. 3:17-00-00	/ I - IVII	
		City or Cou	nty				
Robert David Steet	e and Earth Intelligence	Networ		Jason Goodman			
Vame			_	Name			
11005 LANGTON ARMS CT Street Address Apr.#		VS.	252 7th avenue		6s		
		_	Street Address		Apt.#		
OAKTON,	VA 22124	( 571) 320-8573	_	New York	NY 10001	323 ) 744-7594	
City	State Zip Code			City	State Zip Code	Area Telephone	
	Plaintiff	Code			Defendant	Code	
	rias iuri				Defendant		
		CERTIFIC	ATE	OF SERVI	CE		
		([	OMR	EL58)			
		2/					
I HE	REBY CERTIF	Y that on this <u>26</u>	<u> </u>	day of _Februa	ary 2020	a copy	
- 641.	. 1				ITION TO CO-DEFENDA	NT NEGRON'S	
or the	e document(s) er	ititled MOTION TO	O APPEA	AR BY TELEPHONE			
					Title of Docume	nt(s)	
			W	as/were maile	d, postage prepaid		
Ferna	ando Galindo Cle	rk of the Court			,, O , 1		
		***			<del></del>		
	sing Party or His/Her	Attorney					
701 E	East Broad Street						
Addres	ss						
Ri	chmond	VA		23219			
City	<del></del>		State		<del>- Zip -</del>		
				0/	7		
	Febr	uary 26, 2020		Cha	·		
	Date	<u>.</u>	Signature	<del>-//-/*</del>	<del>-</del>		

Circuit Co	ourt for Eastern E		- <b>4</b>	c	ase No. 3:1	17-cv-601-MI	<u>- L</u>
Robert David Stee	le and Earth Intelligence N	City or Cour	πy				
			_	Jason Goodman			
lame			1.60	Name			
11005 LANGTON ARMS CT		_ <b>V\$</b> .	252 7th avenue		6s		
DAKTON,	VA 22124	Apt.# ( 571) 320-8573	_	Street Address New York	NY 1	0001 (323	Apt.# 744-7594
ity	State Zip Code	Area Telephone Code		City	State Z	Zip Code Area Code	Telephone
	Plaintiff	0000			Defendant		
		CERTIFICA (C	ATE OMR	• - •	CE		
	REBY CERTIFY	DEFENDAN	T'S RES	day of Februa PONSE IN OPPOSI OR BY TELEPHONE		a co	
	r Frank			as/were maile		Document(s) prepaid to:	
= =	sing Party or His/Her / man and Canoles	Attorney					
Addre	ss 021 East Cary S	Street Richmon	d	State VA	 2321 <del></del>	9	
	Febru Date	ary 26, 2020	ignature	94	7		

Robert David Steele and Earth Intelligence Networ  Jame  1005 LANGTON ARMS CT  TOTER Address  DAKTON, VA 22124 (571) 320-85  DAKTON, VA 22124 Code  Plaintiff  CERTII  I HEREBY CERTIFY that on thi  DEFE	73	Jason Goodman Name 252 7th avenue Street Address New York					
In the second state of the	73	Name 252 7th avenue Street Address					
1005 LANGTON ARMS CT  Treet Address DAKTON, VA 22124 (571) 320-85 ity State Zip Code Area Teleph Code  Plaintiff  CERTII  I HEREBY CERTIFY that on thi  DEFE	73	252 7th avenue Street Address	<b>A</b> 11/		A		
I HEREBY CERTIFY that on thi	73	Street Address	<b>A</b> 134	·	A		
NAKTON, VA 22124 (571) 320-85 ity State ZipCode Area Teleph Code  Plaintiff  CERTII  I HEREBY CERTIFY that on thi	73		4137		6s		
State ZipCode Area Teleph  Plaintiff  CERTII  I HEREBY CERTIFY that on thi		New York	4157	Apt.#			
Plaintiff  CERTII  I HEREBY CERTIFY that on thi	ione		NY	10001	(323 ) 7	44-7594	
Plaintiff  CERTII  I HEREBY CERTIFY that on thi		City	State	Zip Code	Area Code	Telephone	
I HEREBY CERTIFY that on thi			Defenda	nt	0000		
DEFE	(DOMR	<b>U</b>	- <u>-</u>				
DEFE		day of Februa			a cop	•	
of the document(s) entitled MOT	NDANT'S RES	SPONSE IN OPPOSI AR BY TELEPHONE	TION TO CO	-DEFEND	ANT NEG	RON'S	
Steven S Biss	v	vas/were maile		of Docum e prepai			
Opposing Party or His/Her Attorney							
300 West Main Street Suite 102							
Address Charlottesville	VA State	22903	—-Zip				
February 26, 202		$\Omega$	7				